

EXHIBIT M

HIGHLY CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In Re: AUTOMOTIVE : 2:12-md-02311
PARTS ANTITRUST :
LITIGATION :
-----:
ALL PARTS CASES :
:
-----:
THIS RELATES TO: :
ALL ACTIONS: :
-----:

HIGHLY CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

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30(b)(6) deposition of

MARK WILLOUGHBY

November 3, 2016 - 8:59 a.m.

Vorys Sater Seymour & Pease LLP

52 East Gay Street

Columbus, Ohio

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1 Q. With whom did you speak internally
2 at Honda?

3 A. Jeff Smith and Jim Roby.

4 Q. Can you spell it.

5 A. R-O-B-Y. And Mark Ehrlich,
6 E-H-R-L-I-C-H.

7 Q. Anyone else?

8 A. No.

9 Q. What is Jeff Smith's role?

10 A. He's in our North American
11 Purchasing planning area.

12 Q. Why don't we back up for a second.
13 Can you tell me the organizational
14 structure for the procurement division?

15 MR. PURCELL: I'll object to the
16 form. You can answer.

17 Q. Give me an idea of how you are
18 structured. You just mentioned that Jeff Smith
19 is in purchasing planning, and that made me
20 think that there must be segmented roles within
21 the procurement division, and so I was going to
22 ask you to describe that for me.

23 A. Could you clarify when you say
24 North American? You said procurement. I just
25 want to clarify your question.

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1 Q. Okay. I'm trying to ask about your
2 role as the North American Procurement division
3 manager, okay? Yes?

4 A. Yes.

5 Q. You have to answer out loud.

6 A. Sorry.

7 Q. So within that division that you
8 manage, how is it organized?

9 A. Within the North American
10 Procurement division that I manage, we have a
11 group called North American Automotive
12 Purchasing. They do procurement, they do the
13 actual sourcing.

14 There is also a group called North
15 American Planning, there is a group called
16 North American Cost Control and North American
17 Indirect Purchasing.

18 So those are the departments under
19 me.

20 Q. The planning department generally,
21 can you describe their role?

22 A. Yes. I would like to clarify, Jeff
23 Smith is not in that structure I just said
24 under planning.

25 Q. Okay.

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1 A. There is a planning group within
2 North American Automotive Procurement or
3 Purchasing, that's where Jeff works.

4 Q. So Jeff works in the purchasing
5 department, but he does planning for the
6 purchasing department?

7 A. Yeah. Everyone in that structure
8 works in the purchasing area. Jeff works in
9 the North American Automotive Purchasing
10 department, and he does planning for that
11 department.

12 Q. Okay. I appreciate that
13 clarification.

14 So let's go back and continue
15 describing for me the different functions that
16 the planning department has within the
17 purchasing division.

18 A. To clarify, do you mean Jeff's area
19 or do you mean the purchasing planning
20 department?

21 Q. So maybe I took bad notes, but I
22 thought you told me that within the procurement
23 division, there were four departments?

24 A. Yes.

25 Q. And they were purchasing, planning,

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1 cost control and North American Indirect
2 Purchasing; did I get that right?

3 A. Yeah. The four -- could you say
4 those four one more time.

5 Q. Sure. I wrote down purchasing,
6 planning, cost control and North American
7 Indirect Purchasing.

8 A. We call the purchasing one North
9 American Automotive Purchasing.

10 Q. Okay.

11 A. And if you would like a description
12 of what those departments do?

13 Q. Yes, please.

14 A. North American Automotive
15 Purchasing is the group that sources parts,
16 works with the suppliers on pricing, gets
17 annual cost reduction, that type of function.

18 Q. Okay. And what about the planning
19 department?

20 A. The planning division works -- it's
21 a very broad group. It works on supplier
22 diversity, it works on overall North American
23 Purchasing planning, it has a systems group
24 that works on new systems that Honda would like
25 to put in place, not part-wise, but like

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1 computer systems, and we also have an
2 administration that handles our budgets, like
3 the expense budget in planning.

4 Q. And what about the cost control
5 department?

6 A. The cost control department's main
7 function is to plan the schedule of the new
8 models and to roll up what we call the unit
9 costs, the model costs.

10 Q. What do you mean by model costs,
11 can you say a little bit more about that?

12 A. We have a -- there is a series of
13 parts that goes into each model. Those parts
14 all need to be added up so we can see what a
15 unit cost is.

16 Q. And that's what the cost control
17 people do?

18 A. Yes. They set the schedule of
19 activities for new model and also they are the
20 leader of the new model to set direction, and
21 then they roll up the total cost and report
22 that.

23 Q. Within the cost control
24 department's work in setting costs or working
25 out the cost for the new model, do they do this

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1 in advance, by setting target prices that they
2 want to hit in obtaining the auto parts, or do
3 they do it on the back end, after all the parts
4 are known and they add them all up together to
5 tell the people what the car is going to cost?

6 A. The new model cost group looks at
7 it from a unit perspective. They don't set
8 targets part by part.

9 Q. And what do you mean by unit?

10 A. The model cost, the total cost of a
11 model. So they will look at the model.

12 Q. The whole car?

13 A. The whole car.

14 Q. So if we are talking about, I don't
15 know -- when is the next Accord coming out, for
16 example, can you tell me, or is that a secret?

17 A. 18.

18 Q. So there is going to be a new
19 Accord in 18, or the 2018 model, and the cost
20 control folks, their job is to add up all of
21 the component costs and tell Honda, this is how
22 much it is going to cost us to build the 18
23 Accord?

24 A. That's a simplification, but, yes.
25 One of their outputs is to do what we call a

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1 unit cost or the 18 model Accord total cost
2 based on part-by-part detail of all the parts
3 that go in that car.

4 Q. So this part-by-part detail that
5 they do an analysis on and add up the cost, my
6 next question is, do they do this only at the
7 end, when all of those part costs are known, or
8 do they try to do something in advance and let
9 the purchasing guys know these are targets that
10 we want you to hit in order to for us to reach
11 an overall cost for the car?

12 A. Could you ask that just a little
13 different way?

14 Q. Sure. I have no idea how OEMs
15 work, but I could imagine there is some cost
16 department, and they work several years in
17 advance on the new models, and then they call
18 the parts purchasing guys, and the cost guys
19 tell the purchasing guy, okay, we are going to
20 roll out the new Accord for model year 2018,
21 and you can't spend more than \$20,000 to put
22 this whole car together.

23 Do your cost guys do something like
24 that, I would imagine?

25 A. Our cost group would work with the

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1 design and sales team to establish the target
2 costs overall for the model, what we call unit,
3 that set that target, and that cost would be
4 shown to the individual, or to the North
5 American Automotive Purchasing group, as the
6 model is getting kicked off.

7 So their function is to share that
8 target cost for the model with the team.

9 Q. The target cost that you just
10 described for me, how granular does that get?
11 Does that go all the way down to this ball
12 bearing can't be more than five cents or is
13 it -- or are they grouped by components?

14 A. They look at it from a model
15 viewpoint. It's not granular.

16 Q. A car is a unit, in your speak,
17 right?

18 A. Yes.

19 Q. So they look at the whole unit and
20 they say, giving my example from before, this
21 unit has to cost 20,000 or less?

22 A. Yeah. They will set the unit cost
23 at 20,000. Now, to clarify, they are not the
24 group that sets that independently, that's set
25 across the Honda SEDB team, which is sales,

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1 plants, purchasing and design.

2 Q. So again, I'm imagining how this
3 might work, so let me lay this out for you and
4 you tell me where I get it wrong.

5 The design guys say, we want the
6 greatest car that the world has ever seen, and
7 it's going to go a gazillion miles an hour, and
8 the tires will never wear out, and your guys
9 say, well, it's going to cost you, and then the
10 marketing guys say, we can't sell an Accord for
11 a million dollars, we are in the mid-budget
12 family range, and then they duke it out, have
13 discussions, and then the final cost is set,
14 and your cost control department is involved in
15 these discussions; is that roughly how it
16 works?

17 A. Yes.

18 Q. All right. Going back to the list
19 of your departments, you also mentioned the
20 North American Indirect Purchasing department.
21 Can you tell me what they do?

22 A. The North American Indirect
23 Purchasing buys non-OEM part, or original
24 equipment manufacturing parts, so they will buy
25 equipment for Honda plants, for example, or oil

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1 for Honda plants, you know, things that aren't
2 directly parts on the car.

3 Q. So they would be like buying the
4 robots that put the cars together?

5 A. Yes. Or gloves to put -- for the
6 associates on the line. Anything that's not a
7 direct part on the unit is what they buy.

8 Q. So we don't have to talk about them
9 anymore today, do we.

10 All right. I want to go back and
11 try to get an understanding now about the
12 documents that might be created within the
13 cost -- what you call the cost control
14 department.

15 So tell me about their electronic
16 document system, do they have email, do they
17 have some sort of internal communication system
18 that's not email, is there a shared file server
19 where they save documents electronically, is
20 there a giant file cabinet with tons of paper,
21 just describe for me what documents they have
22 and how they keep them?

23 A. In the cost control?

24 Q. In the cost control, yes.

25 A. They do have some shared drives

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1 that show project schedules. It's a way we
2 pull our group together so we are moving
3 together.

4 And are you most interested in cost
5 documents?

6 Q. Well, for the moment. We will talk
7 about purchasing in a minute, but I want to
8 just stay on costs for the time being. So if
9 you can, narrow your answers to cost, but if
10 there is bleed-over, you know, the whole
11 division keeps documents the same, then just
12 tell me that.

13 A. So the main cost system that our
14 cost control department has is a system called
15 CSS, it's a cost simulation system.

16 Q. This is electronic?

17 A. It's electronic.

18 Q. Do you know what kind of platform,
19 like a Lotus platform?

20 A. It's a mainframe database. That's
21 one of their main cost systems is CSS. The
22 other is CMS, which is cost management system.

23 Q. So let's talk about just the CSS
24 for the moment. I believe you told me that's a
25 mainframe database?

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1 A. Uh-huh.

2 Q. Yes?

3 A. Yes, yes. Sorry.

4 Q. How far back does the data go
5 that's in that database?

6 A. Our record retention is for ten
7 years.

8 Q. Does that mean it's kept -- let me
9 ask a better question. Does that mean that you
10 would expect at any given time, say today,
11 there would be ten years worth of live data in
12 the CSS that could be accessed?

13 A. Some of the data is already pulled
14 off the mainframe and archived in files.

15 Q. Do you have a time period that
16 there is active or live data in the CSS
17 mainframe database?

18 A. I'm not sure of the exact time.
19 Sometimes, as our files get full, we will pull
20 one off and archive it, so I don't know the
21 detail.

22 Q. When Honda archives data from the
23 CSS mainframe database, how is that archived,
24 do you use backup tapes or backup disks, or how
25 does it work?

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1 A. We use backup disks.

2 Q. Do you know how far back the
3 archived data exists on the backup disks for
4 the CSS mainframe database?

5 A. Our record retention is ten years.
6 There may be some that are existing longer than
7 that.

8 Q. For CSS, do you know if you have
9 data that goes back more than ten years?

10 A. I'm confident we can go back ten
11 years. I don't know how much further back we
12 could go.

13 Q. And how would you check that?

14 A. We would -- for me, I would go to
15 that group and ask them how much they have and
16 what is the status of the disk, and they do
17 have a book that has the list in it, so we
18 could check what they have.

19 Q. There is a physical book that has
20 copies of the disks?

21 A. Yeah. For CSS, there is a book
22 that shows that. I used to be the department
23 manager of that group. At that time there was.
24 I've been out of there for a little while now,
25 so I think there still is, but it could have

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1 stopped.

2 Q. The book that you remember from
3 your time there, does it contain just a list of
4 the backup data, or is this like plastic sheets
5 with CDs or DVDs actually in the book?

6 A. No. It's a DVD in the book, or a
7 disk or DVD, I'm not sure which, but there is
8 an actual file for models. I don't know how
9 far back they on go.

10 Q. How far back they go, to retrieve
11 the archived data, you would just have to get
12 your hands on the physical book to collect the
13 DVDs?

14 A. Yes.

15 Q. Where is the book locations, is
16 that in your office?

17 A. It's in our office.

18 Q. When you all create the archives,
19 in other words, moving the data from the live
20 mainframe to one of these DVD backups, is that
21 something that the employees within the cost
22 control department do, or do they have to
23 involve IT to help them create the archival
24 system?

25 A. I'm not 100 percent sure. I

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1 believe the associates themselves do that.

2 Q. They have the ability to sit at
3 their desktop, stick in a DVD, and say, okay,
4 move the data to the DVD?

5 A. Yes.

6 Q. Do you know how much time it would
7 take to download all of the current data that
8 is live on the CSS to some sort of portable
9 media, such as a DVD?

10 A. Not an exact time. From a general
11 sense, CSS data in the system, it's not
12 difficult to extract.

13 Q. Okay. Now, talk to me about the
14 CMS, the cost management system. Is that also
15 a mainframe database?

16 A. Yes. And it's used for mass
17 production parts.

18 Q. What is a mass production part?

19 A. It's a cost for a part that's in
20 production. For contrast, CSS is cost
21 simulation system, it is working with new model
22 costs before a model goes into production.

23 Q. And then the CMS is what is
24 actually in production?

25 A. CMS is the database used from that

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1 group when a part is in production.

2 Q. Do you have the same ten-year
3 retention policy for CMS?

4 A. Yes.

5 Q. Do you know how much of the
6 ten-year retention policy is live on the
7 mainframe versus what's in backup?

8 A. I don't.

9 Q. Is CMS, does it use the same sort
10 of mainframe architecture that the CSS does, do
11 you know?

12 A. Can you define what you mean by
13 "architecture"?

14 Q. I can ask a better question.

15 Does it work the same way, the data
16 is also stored on a mainframe between CMS and
17 CSS?

18 A. Yes.

19 Q. And then the archival system that
20 you used for CMS, is it the same as the system
21 that you described for CSS, or is it different
22 in some way?

23 A. We archive in a similar way.

24 Q. So the archival data for CMS would
25 also be stored in DVDs?

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1 A. Yes.

2 Q. And those DVDs are also easily
3 accessible in your office?

4 A. Yes. As long as we have them, yes.

5 Q. And then in terms of downloading
6 whatever current information is on the CMS
7 database, would it be a similar exercise as to
8 downloading the live data from the CSS that you
9 already described?

10 A. Yeah. When you say "similar
11 exercise," I'm not sure. You mean in terms of
12 time or in terms of what?

13 Q. Of how much time it would take and
14 how difficult it would be for Honda to download
15 that live data.

16 A. CMS is similar to CSS in terms of
17 it's on the mainframe. It's not difficult to
18 extract CMS reports.

19 Q. Still focusing on cost control, do
20 they use any other databases besides the CSS or
21 the CMS that you already described?

22 A. Those are the cost databases that
23 team is responsible for.

24 Q. I believe you also mentioned that
25 they do use a shared -- one or more shared

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1 drives; did I get that right?

2 A. We have shared drives for basic
3 information. It's on the new model side of the
4 cost. There is -- shared drive is a way to
5 just have common information shared across
6 different groups.

7 Q. Can you give me an example of the
8 types of common information that your group
9 would post to the shared drive so different
10 people can access it?

11 A. Production schedules, new model
12 development schedules, items like that that are
13 standard that we need across our group.

14 Q. The shared drives, are they
15 structured in folders that say, for example,
16 that most of us are familiar with in the
17 Microsoft operating world?

18 A. Yes.

19 Q. Do you have an idea about how many
20 folders or how much data is on these shared
21 drives?

22 A. I have no idea.

23 Q. What about the folder structure,
24 are there main folders and then subfolders?

25 A. Yes. It would follow what I guess

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1 would be kind of a tree, kind of a model, and
2 then different things under that possibly, like
3 schedules or general information.

4 Q. Can you give me a rough idea what
5 this file tree would look like? Are there
6 thousands of different folders or ten or --

7 A. I can't say the exact number, but I
8 can say it is very, very large.

9 Q. Do you know if it would be possible
10 to generate a file tree directory of this
11 shared drive?

12 A. I'm not sure. I've never done
13 that, so I'm not sure.

14 Q. The documents that are stored on
15 the shared drive, what kind of file types are
16 the documents? Are these Word documents, Excel
17 documents, PDFs?

18 A. Those are all good, PowerPoint,
19 Excel, Word, all those types of files --
20 generally those types of documents.

21 Q. So Microsoft Office type documents
22 plus Adobe PDF?

23 A. Yeah.

24 Q. Any other some sort of unique file
25 that you would have to have a special program

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1 to open?

2 A. There could be. I don't know of
3 any.

4 Q. In terms of drive size, do you know
5 how large the shared drive is?

6 A. I don't.

7 Q. Do you know how far back the data
8 goes on the shared drive?

9 A. I don't know exactly. From a
10 general sense, we don't leave models out there
11 forever, so as data becomes obsolete, we will
12 pull it off of the shared drive.

13 Q. Is the shared drive used primarily
14 for models that are in production?

15 A. Primarily for models in the new
16 model phase.

17 Q. So this would be more forward
18 looking?

19 A. I don't know.

20 Q. New models that you expect to come
21 online?

22 A. Models that are in development, is
23 how I would phrase it.

24 Q. This shared drive that we have been
25 discussing, does it have a particular name?

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1 A. No. We have different types of
2 drives, and to my knowledge, we all just call
3 it shared drive. Like there is different types
4 of shared drives. There is one for a cost
5 group, one for a different cost group. So they
6 call them shared drives, and they might have a
7 letter in front of it, like N drive or H drive
8 or something like that.

9 Q. The one we are discussing, do you
10 know what the letter is for it?

11 A. For the cost group, I'm
12 not -- sorry. Some of us have different
13 letters for the same share drive, just the way
14 we get in. So I think it's typically either an
15 N drive or an H drive.

16 I do want to clarify that there is
17 not so much cost on many of those share drives
18 though, since we are talking about costs. It
19 is more general information about the model.

20 Q. Such as -- you already told me
21 there would be, like, schedules. What other
22 general information about the model would be in
23 this cost group shared drive?

24 A. I guess model, schedule for when we
25 should take a certain activity, information on

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1 a correspondence between a factory and us on
2 development. It's more a general sense. It's
3 not detail part costs on that shared drive.

4 Q. So you think if we were interested
5 in looking at part cost or pricing history or
6 procurement, those sorts of things, that this
7 cost group share drive would not be a
8 particularly good source of information for us?

9 A. I think the main system that has
10 cost data from the cost group is CSS.

11 Q. Tell me about communications within
12 the cost group. Do they use email or some
13 other internal instant messaging system?

14 A. It's a really broad question. Do
15 you mean cost group and other groups, or
16 between cost group and cost group? Could you
17 clarify.

18 Q. About how many employees are in the
19 cost group?

20 A. About 38.

21 Q. So these 38 or so employees, on a
22 daily basis, they are communicating either
23 amongst themselves or with others outside the
24 cost group, yes?

25 A. Yes.

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1 Q. And what I'm interested in is how
2 they communicate in written form. Do they --
3 is there a normal practice to use email, or is
4 there some other mechanism that they
5 communicate in written form?

6 A. We definitely use email in that
7 group. Some of the associates use -- sorry,
8 I'm not so tech savvy, but the, like the
9 instant messaging that comes up on notes, and
10 of course just discussion.

11 Q. Do you all use -- well, let me ask
12 you about the cost group. Does the cost group
13 use a Lotus Notes platform?

14 A. All purchasing uses Lotus Notes.
15 All Honda uses Lotus Notes.

16 Q. Okay.

17 A. At HNA, anyhow, Honda North
18 America.

19 Q. So the cost group shared drive you
20 were talking about, for example, the employees
21 would access that through their Lotus Notes
22 work space on their desktop?

23 A. No.

24 Q. They go outside of Lotus Notes?

25 A. Those are maintained on a

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1 mainframe.

2 Q. Okay. And within Lotus Notes,
3 there is an instant messaging application?

4 A. Yes.

5 Q. Do you know if those instant
6 messages are retained?

7 A. I really don't know.

8 Q. Do you know who would know?

9 A. I think someone in our IT area
10 could tell us how that works, what's backed up,
11 and if instant messages are included in that.

12 Q. Other than email and instant
13 messaging, do you know of any other routine way
14 that the cost group employees communicate in
15 written form?

16 A. Those would be the most typical
17 ways.

18 Q. What is the email retention policy
19 for the cost group?

20 A. I don't know the detail on policy
21 for email. I know if there is holds on some
22 things, that those get held, but I think for
23 the cost group right now, I don't know of any
24 holds that they have.

25 Q. If there is no hold in place, is

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1 there some routine policy by which email gets
2 either deleted or archived after a certain
3 amount of time?

4 A. I don't know the details of it, but
5 my understanding is that, yes, after some time
6 period, emails may get deleted. That's my
7 understanding. I'm not --

8 Q. Deleted or archived, or do you
9 know?

10 A. I'm not sure.

11 Q. Is there a written policy that
12 would spell this out?

13 A. There is definitely a written
14 policy if there is a document hold. So there
15 is a document for that, and IT may have
16 something that shows what the rule is on other
17 emails, more standard emails.

18 Q. Tell me about email and instant
19 messaging, I was asking in the context of the
20 cost group. Would your answers be the same for
21 all of the purchasing division?

22 A. I believe so. We all use E-quotes
23 in instant messaging as a way to communicate
24 with each other.

25 Q. I think you just said E-quote, did

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1 I hear that right?

2 A. I meant email. I'm sorry.

3 Q. What is E-quote?

4 A. E-quote is a method we use, it is
5 an electronic quote, is what E-quote stands
6 for, and it's how we set our price with the
7 suppliers.

8 Q. Let's put a pin in E-quote. We
9 will come back and talk more about that later.

10 I got way off track about 45
11 minutes ago. I had asked you who you talked to
12 prepare for the deposition, and you had
13 mentioned Jeff Smith in purchasing planning,
14 yes?

15 A. Yes.

16 Q. Do you remember what you and Jeff
17 talked about?

18 A. Some basic retention guidelines.

19 Q. Do you remember what those basic
20 retention guidelines were that you discussed
21 with Jeff?

22 A. There was a few. One is how long
23 do we hold some of our sourcing documents, how
24 long do we hold quotes, things like that.

25 Q. Anything else that you discussed

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1 design team, but once you get to the RFQ step,
2 how does that work?

3 Are RFQs pieces of paper that are
4 mailed out, is there an advertisement in some
5 trade magazine, how do RFQs get issued?

6 A. There is a blanket RFQ made for
7 each model that comes up, and that will be --
8 it covers things like volume, basic production
9 schedule, what plant we'll produce the model
10 at, and that will get issued along with the
11 drawing to the supplier by the buyer.

12 We have a drawing transition system
13 that gets matched up with a RFQ.

14 Q. Within the North American
15 Purchasing division -- did I get that
16 right -- are there particular employees that
17 you call a buyer that work on particular types
18 of parts or with particular suppliers, or is it
19 just catch as catch can, you get whatever comes
20 up that day?

21 A. To try to help set the structure a
22 little bit, within our North American
23 Procurement group, we have multiple teams, and
24 they are divided up. We say, A-1, and they
25 happen to handle mostly stamping or body type

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1 that decodes the coding? So, for example, a
2 field might say -- I'm making this up -- E-20,
3 would there be another field that says if you
4 want to know what E-20 means, here's what it
5 means?

6 A. I understand your question. I'm
7 not sure that's right in the E-quote itself,
8 but we definitely, within Honda, have a code
9 summary that shows what all the different codes
10 mean.

11 Q. That code summary that Honda has,
12 is that something that's easily collected and
13 could be produced?

14 A. Yes.

15 Q. The data that's in the E-quote
16 system, does it go all the way back to 2005?

17 A. The data in E-quote goes back to
18 2005, if it is an approved cost.

19 Q. The data that's in E-quote, do you
20 know if it is -- if it's something that could
21 be easily extracted, downloaded and produced?

22 A. We can run queries out of E-quote
23 that will show what's in E-quote.

24 Q. What about just downloading a copy
25 of the entire database, do you know if that is

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1 possible?

2 A. I don't know if it's possible or it
3 would be amazingly huge, because it would be,
4 within E-quote, it has a cost, supplier cost,
5 it also has every quote that is approved in
6 there from every model from every supplier. So
7 I don't know what it would take to download
8 that.

9 Q. So this is not something you have
10 investigated to determine how many manhours or
11 how long or how much it might cost to download
12 the entire database; is that right?

13 A. I have not. Depending -- could I
14 clarify one point? E-quote holds all the
15 quotes and the data. E-quote does feed another
16 system that will show the supplier and the
17 cost, that is easier to consider to think about
18 how to get.

19 Q. What's the other system that
20 E-quote feeds?

21 A. It feeds a system called cost
22 management system, which is part of the cost
23 group.

24 Q. That's the CMS database that you
25 talked about?

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1 been kept from your buyers -- or for your
2 buyers, how hard would it be for you to do
3 that?

4 Do you go down the hall and look at
5 them or call record retention, say, hey, send
6 me these boxes, how does that work?

7 A. We would call record retention and
8 say, "Please send back." Would it be 100
9 percent there? I don't know, but that would be
10 our starting point to find those diaries. It
11 would be an incredible amount of data.

12 Q. Do you have an idea how many
13 diaries or how many boxfuls of diaries there
14 might be?

15 A. I don't have any idea how many
16 boxfuls, but in North American Procurement
17 division, for NAAP, it is about 200 associates,
18 so it is a lot of diaries, a lot of notes.

19 Q. How are they diaries stored? Are
20 they organized by employee function?

21 I'm thinking, what if we just
22 wanted to see the diaries from the buyers,
23 could you call up records retention and make
24 that request, or would they just have to send
25 you all the diaries, and you would have to look

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REPORTER'S CERTIFICATE

The State of Ohio,)

SS:

County of Cuyahoga.)

I, Wendy L. Klauss, a Notary Public within and for the State of Ohio, duly commissioned and qualified, do hereby certify that the within named witness, MARK WILLOUGHBY, was by me first duly sworn to testify the truth, the whole truth and nothing but the truth in the cause aforesaid; that the testimony then given by the above-referenced witness was by me reduced to stenotypy in the presence of said witness; afterwards transcribed, and that the foregoing is a true and correct transcription of the testimony so given by the above-referenced witness.


I do further certify that this deposition was taken at the time and place in the foregoing caption specified and was completed without adjournment.

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1 I do further certify that I am not
2 a relative, counsel or attorney for either
3 party, or otherwise interested in the event of
4 this action.

5 IN WITNESS WHEREOF, I have hereunto
6 set my hand and affixed my seal of office at
7 Cleveland, Ohio, on this 7th day of
8 November, 2016.

9
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12 
13

14 Wendy L. Klauss, Notary Public
15 within and for the State of Ohio
16

17 My commission expires July 13, 2019.
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